

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY **REGION 10**

1200 Sixth Avenue Seattle, WA 98101

October 10, 2001

WAP 6906 7C

MEMORANDUM

Ridgefield Brick and Tile SUBJECT:

EPA Site ID No. WAD009036906

FROM:

Monica Tonel, Superfund Program Monica Tone (
Office of Environment) Office of Environmental Cleanup (ECL)

Judy Stone, Resource Conservation and Recovery Act Program Office of Waste & Chemicals Management (WCM)

Official CERCLA and RCRA site files TO:

BACKGROUND

On March 31, 1999, the Office of Inspector General (OIG) released an audit report entitled "Superfund Sites Deferred to RCRA," which assessed EPA's implementation of its Resource Conservation and Recovery Act (RCRA) deferral policy. The OIG concluded that a large portion of the sites deferred to RCRA did not meet the deferral criteria and were therefore inappropriately deferred. The above subject site has been identified as one of those "deferred" sites requiring a review of the deferral decision.

PURPOSE

This memorandum is written in reference to the interim quidance provided by EPA Headquarters, OSWER Directive 9200.1-31P, and serves to:

- clarify the current status of the above subject site in both the Superfund and RCRA programs,
- identify the program that will maintain responsibility for the site, and
- clarify any changes to the CERCLIS database resulting from this review.

Superfund program, current status. The Superfund program has determined that its decision, made in 1992, to defer the subject site to the RCRA program is valid. No further assessment/action under the federal Superfund program is anticipated, at this time. Should new or additional information become available necessitating further Superfund consideration, this site will be reevaluated at that time.



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m RCRA}$ program, current status. The site was referred by the RCRA program to the Washington State Toxics Cleanup Program.

<u>SF tracking/CERCLIS database</u>. The Non-NPL Status field in CERCLIS will reflect a "Deferred to RCRA" value. The RCRA Deferral Audit Special Initiative Indicator will reflect a "RCRA Deferral-Lead Confirmed" value.

Additionally, in accordance with EPA's decision regarding the tracking of sites for which no further work under the federal Superfund program is planned at this time, the subject site was removed from the CERCLIS database and placed in a separate archival data base as a historical record. Archived sites may be returned to the CERCLIS site inventory if new information necessitating further Superfund consideration is discovered.